

**Before the
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
Columbia, South Carolina 29210**

In the Matter of the Petition of on Behalf of)	
the South Carolina Telecommunications)	
Industry, For Approval of NPA Relief Plan)	Docket No. 2022-141-C
for the 864 NPA)	

REQUEST FOR WAIVER OF PUBLICATION REQUIREMENT

The North American Numbering Plan Administrator (“NANPA”), in its role as the neutral third party Numbering Plan Area (“NPA”) Relief Planner for South Carolina under the North American Numbering Plan and on behalf of the South Carolina telecommunications industry (“Industry”),¹ respectfully requests that that the South Carolina Public Service Commission (“Commission”) waive the requirement that NANPA publish the “Notice of Filing” (“Notice”).

In a letter to the undersigned dated April 27, 2022, the Commission directed NANPA to publish a Notice “at its own expense, on or before **May 13, 2022**; the enclosed Notice in newspapers of general circulation one time and provide the undersigned Proof of Publication on or before **June 2, 2022**.”² The NANPA is a non-governmental entity that is impartial and not aligned with any particular telecommunication industry segment and complies with Section 52.12 of the Federal Communication Commission’s Rules.³ In addition, Section 8.1.7,

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 864 area code of South Carolina.

² Letter to Ms. Cecilia McCabe, NANPA, from Clerk’s Office, The Public Service Commission State of South Carolina, Docket No. 2022-141-C, dated April 27, 2022.

³ 47 C.F.R. § 52.12

Neutral Facilitator Role, in the NANPA/PA Technical Requirements Document (“TRD”) states that “NANPA/PA shall act as neutral facilitator (e.g., issuing meeting announcements, coordinating meeting arrangements, setting an agenda, providing a conference bridge and web conferencing capabilities, leading the meeting, issuing meeting minutes, and performing other duties necessary to conduct the meeting) for all relief planning meeting(s).”⁴ As such, the NANPA is responsible for the fair and efficient overall administration of the North American Numbering Plan (“NANP”) numbering resources, including area codes.

Per Section 15 of the TRD, Enterprise Services are functions performed by the NANPA that are outside of the requirements and responsibilities detailed within the document, and associated industry guidelines and regulatory orders. They are additional services that may be provided by the NANPA to carriers and other entities for a specific fee. These are described as services that the NANPA can provide but are limited to meeting the needs of a limited number of customers. Enterprise Services and their associated fees are subject to prior review by the NANC and approval by the FCC and other applicable regulatory authorities before they can be implemented and made available to the requestor(s).⁵ As a neutral administrator, NANPA filed the Petition on behalf of the Industry but has no provision in its contract to publish the public Notice seeking comments at its own expense as required by this letter.

⁴ *Combined NANPA/PA Technical Requirements Document*, Description/Specifications, 273FCC21C0003-revised P0002, Attachment 1.1 (August 27, 2021).

⁵ *Id.*

Therefore, based upon the foregoing reasons, NANPA respectfully requests that the Commission waive the publication requirement.

If NANPA is required to publish the Notice as directed, we suggest that language be added to notify the public that an all-services distributed overlay is recommended by the Industry for relief of the 864 NPA and if approved by the Commission, a new area code will be added to the same geographic area as the 864 NPA. Simply providing the dialing plan in the Notice does not inform the public that there will be a new NPA added as a result of this project. In addition, since the Notice is intended to solicit comments on the Industry's petition for a new NPA, we request that NANPA be removed as a contact for questions since NANPA has no independent view regarding the Industry's recommendation as the neutral administrator. If the Commission prefers to leave NANPA as a contact, we request that the NANPA contact information be moved to the end of the contact list rather than being listed as the first contact.

Respectfully submitted,



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cc: Office of Regulatory Staff

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CERTIFICATE OF SERVICE

This certifies that I have caused to be served this day, the Request for
Waiver of Publication Requirement filed by the North American Numbering Plan
Administrator, as follows:

Via Electronic Mail Service

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May 6, 2022
Herndon, Virginia